

State Water Resources Control Board

April 19, 2018

(Via email and Certified Mail)

CERTIFIED MAIL
NO. 7017 2680 0000 6289 4923

Ms. Carol Johnson
Interim Director
Santa Cruz County General Services Department
701 Ocean Street, Suite 330
Santa Cruz, California 95060
carol.johnson@santacruzcounty.us

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEM
LOCATED AT SANTA CRUZ COUNTY GENERAL SERVICES DEPARTMENT –
GOVERNMENT CENTER, 701 OCEAN STREET, SANTA CRUZ**

Dear Ms. Johnson:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the UST at your facility on April 11, 2018, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Secondary Containment – The piping sump failed secondary containment testing.	Diesel	3/14/17	Ongoing	H&SC 25291(a)(2)
2	Failure to Maintain Response Plan – The response plan does not identify spill control and clean up equipment.	Diesel	4/11/18	Ongoing	23 CCR 2632(d)(2)
3	Failure to Provide Designated Operator Training to Employees – The last employee training provided by the designated operator was November 5, 2015.	Diesel	12/1/16	Ongoing	23 CCR 2715(f)
4	Failure to Maintain UST Monitoring System – The power light on the Veeder Root monitoring panel is not functional.	Diesel	4/11/18	Ongoing	23 CCR 2630(d)

Office of Enforcement | 801 K Street, Suite 2300 | Sacramento, CA 95814 | 916.341.5272

FELICIA MARCUS, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

No.	Violation	Tank	Start Date	Stop Date	Regulation
5	Failure to Maintain Tank Information Form – In CERS, overfill protection is listed as “Exempt”; however, a fill tube shut-off valve was observed in the fill pipe at the time of inspection. In addition, the piping system lists safe suction; however, it is a conventional suction system.	Diesel	4/11/18	Ongoing	23 CCR 2711(a)
6	Failure to Maintain Monitoring Plan – In CERS, pipe monitoring states “yes” for suction piping exemption; however, the piping at this facility does not meet the exemption criteria.	Diesel	4/11/18	Ongoing	23 CCR 2632(d)(1)
7	Failure to Maintain Financial Responsibility – The Certification of Financial Responsibility needs to be updated to reflect the current financial mechanism being used. If self-insurance is the mechanism being used, a current self-insurance test is required annually.	Diesel	4/11/18	Ongoing	23 CCR 2711(a)(11)
8	Failure to Maintain Site Map – The site plan in CERS does not show the location of the piping and monitoring panel.	Diesel	4/11/18	Ongoing	23 CCR 2711(a)(8)
9	Failure to Monitor Product Piping – The supply and return product lines are currently not monitored, so a leak is not able to be detected at the earliest opportunity. The supply line is conventional suction and does not meet the exemption criteria. The return line is pressurized and does not have a line leak detector, and an annual 0.1 gallon per hour line tightness test. Also, daily visual inspections have not been performed.	Diesel	4/11/18	Ongoing	H&SC 25291(b); 23 CCR 2630(d)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and Santa Cruz County Environmental Health within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Mr. Joseph Lovesee
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
joseph.lovesee@waterboards.ca.gov

Local CUPA

Ms. Rebecca Supplee
Hazardous Materials Program Manager
Environmental Health Division
Santa Cruz Health Services Agency
701 Ocean Street, Suite 312
Santa Cruz, California 95060
rebecca.supplee@santacruzcounty.us

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Ms. Rebecca Supplee
Hazardous Materials Program Manager
County of Santa Cruz
rebecca.supplee@santacruzcounty.us